

Exhibit B

(Chronological Listing of Services and Declaration of Carlo Sabatini in Support of
Hourly Rate)

Sabatini Freeman, LLC

216 N. Blakely St.
Dunmore, PA 18512

Statement as of: 6/9/2021

Michael Badyrka
64 Center Street
Pittston, PA 18640

Our file number: 3343-001

Rate Summary

Professional	Gross		Discount		Net
Brett Freeman	1.70 hours at \$310.00/hr	\$527.00	1.70 hours	(\$527.00)	\$0.00
Carlo Sabatini	23.90 hours at \$415.00/hr	\$9,918.50	3.30 hours	(\$1,369.50)	\$8,549.00
Ashley Werner	16.90 hours at \$135.00/hr	\$2,281.50	2.80 hours	(\$378.00)	\$1,903.50
Total:	42.50 hours (before discount)	\$12,727.00	7.80 hours	(\$2,274.50)	\$10,452.50

Itemized Listing of Services

<i>Date</i>	<i>Description</i>	<i>Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Discount</i>
10/23/2020	Meet with client for debt defense consultation.	CS 415.00	0.70	290.50	-290.50
10/24/2020	Email to client regarding budget, paystubs, and debts	CS 415.00	0.10	41.50	0.00
10/25/2020	Receive and review emails (4) from client attaching paystubs	CS 415.00	0.10	41.50	0.00
10/26/2020	Badyrka, Michael - Meet with client for hiring appointment.	ASW 135.00	0.30	40.50	0.00
10/26/2020	Badyrka, Mike - Work on client's budget	CS 415.00	0.40	166.00	0.00
10/26/2020	Meet with client via zoom for bankruptcy consultation.	CS 415.00	0.40	166.00	-166.00
10/27/2020	Meet with client via Zoom for bankruptcy hiring appointment.	CS 415.00	0.40	166.00	0.00
10/27/2020	Email to client with Bankruptcy Guidelines	CS 415.00	0.10	41.50	0.00
10/27/2020	Call with client to provide various disclosures, case analysis, budget analysis	CS 415.00	1.20	498.00	0.00
11/12/2020	Call from client regarding requested documentation.	CS 415.00	0.10	41.50	0.00
11/13/2020	Receive and review email attaching items needed for bankruptcy schedules.	ASW 135.00	0.10	13.50	0.00
11/13/2020	Input information into spreadsheet and email CS regarding the same.	ASW 135.00	0.30	40.50	0.00
11/13/2020	Call with client regarding missing information.	ASW 135.00	0.10	13.50	0.00
11/13/2020	Work with budget.	CS 415.00	0.50	207.50	0.00
11/13/2020	Email to client with new list of items needed	CS 415.00	0.10	41.50	0.00
11/16/2020	Receive and review several emails with income and expense documentation.	ASW 135.00	0.10	13.50	0.00
11/16/2020	Input information into spreadsheet.	ASW 135.00	0.40	54.00	0.00

11/16/2020	Meet with client regarding budget and plan payment.	CS	415.00	0.40	166.00	0.00
11/23/2020	Call with client regarding upcoming hearing and documentation needed for schedules.	CS	415.00	0.20	83.00	0.00
12/03/2020	Call to client regarding documentation.	CS	415.00	0.10	41.50	0.00
12/14/2020	Receive, review, and respond to email from PM regarding client's questions concerning schedules.	ASW	135.00	0.10	13.50	-13.50
12/14/2020	Review client's questions and email PM regarding the same	ASW	135.00	0.10	13.50	-13.50
12/14/2020	Conference with PM regarding CMA	ASW	135.00	0.10	13.50	-13.50
12/14/2020	Review file regarding appraisal/CMA. Email to CS regarding the same	ASW	135.00	0.10	13.50	0.00
12/14/2020	Call with client regarding bankruptcy filing and missing documentation.	CS	415.00	0.20	83.00	0.00
12/15/2020	Receive and review submitted electronic questionnaire to confirm completion	ASW	135.00	0.10	13.50	0.00
12/15/2020	Conference with PM regarding client's electronic questionnaire	ASW	135.00	0.10	13.50	-13.50
12/17/2020	Receive, review, and respond to email from PM regarding organization checklist	ASW	135.00	0.10	13.50	-13.50
12/17/2020	Work on means test	CS	415.00	1.20	498.00	0.00
12/18/2020	Conference with PM regarding client's debts	ASW	135.00	0.10	13.50	-13.50
12/18/2020	Call with client. Work on means test and plan	CS	415.00	1.10	456.50	0.00
12/23/2020	Receive and review email from client authorizing wage attachment	ASW	135.00	0.10	13.50	0.00
12/24/2020	Complete due diligence checklist. Finalize plan.	CS	415.00	2.30	954.50	0.00
12/26/2020	Meeting with client to go over the schedules and file online	CS	415.00	1.70	705.50	0.00
12/26/2020	Complete filing additional documents and finish post-filing checklist	CS	415.00	0.60	249.00	0.00
12/28/2020	Receive and review docket entry regarding certificate of service not filed for wage attachment motion. Email to clerk regarding the same	CS	415.00	0.10	41.50	0.00
01/05/2021	Receive and review email from Kreider confirming receipt of DSO certification	CS	415.00	0.10	41.50	-41.50
01/06/2021	Receive and review email from Rodichok at Trustee's confirming receipt of appraisal	CS	415.00	0.10	41.50	-41.50
01/06/2021	Receive and review email from Rodichok at Trustee's confirming receipt of tax return	CS	415.00	0.10	41.50	-41.50
01/11/2021	Receive meeting of creditors and appointment of trustee. Process checklist of tasks for after 341 date has been set.	ASW	135.00	0.50	67.50	0.00
01/11/2021	Receive and review order granting motion for wage attachment order	ASW	135.00	0.10	13.50	-13.50
01/11/2021	Review BNC Certificate of Notice regarding 341 meeting. No bypassed recipients. NAN	ASW	135.00	0.10	13.50	0.00
01/11/2021	Review and analyze proof of claim 1 filed on the docket. Email to CS regarding analysis	ASW	135.00	0.30	40.50	0.00
01/11/2021	Review BNC Certificate of Notice regarding order on wage attachment to confirm service on employer.	ASW	135.00	0.10	13.50	0.00

01/11/2021	Receive and review certificate of financial management	CS	415.00	0.10	41.50	0.00
01/11/2021	Receive and review analysis of proof of claim 1 filed on the docket.	CS	415.00	0.10	41.50	0.00
01/11/2021	Email to client regarding 341 meeting	CS	415.00	0.10	41.50	0.00
01/12/2021	Review and analyze proof of claim 2 filed on the docket	ASW	135.00	0.20	27.00	0.00
01/12/2021	Receive and review trustee's acknowledgment of DSO certification	ASW	135.00	0.10	13.50	0.00
01/13/2021	Receive and review email from client with financial management certificate	ASW	135.00	0.10	13.50	-13.50
01/14/2021	Call from client regarding 341, plan confirmation, and plan payment.	ASW	135.00	0.10	13.50	0.00
01/15/2021	Receive and review BNC Certificate of notice regarding 341 meeting	ASW	135.00	0.10	13.50	0.00
01/15/2021	Email to client regarding new payment address	CS	415.00	0.10	41.50	0.00
01/19/2021	Receive and review certificate of financial management filed on the docket	ASW	135.00	0.10	13.50	-13.50
01/19/2021	Review and analyze proof of claim 4 filed on the docket	ASW	135.00	0.20	27.00	0.00
01/19/2021	Prepare file for 341 meeting	ASW	135.00	0.80	108.00	0.00
01/19/2021	Reviewed file to verify that tax returns were provided to Trustee's office. Prepare proof of same in case requested at Meeting of Creditors.	ASW	135.00	0.10	13.50	0.00
01/19/2021	Review claims filed in case, review plan, review other documents filed, notate file regarding claims that we need filed, draft interoffice memo to CS summarizing claims and case status	ASW	135.00	0.70	94.50	0.00
01/19/2021	Call to client for 341 prep	ASW	135.00	0.30	40.50	0.00
01/19/2021	Review client responses to 341 preparation questions	CS	415.00	0.10	41.50	0.00
01/20/2021	Call to client regarding 341 responses.	ASW	135.00	0.10	13.50	0.00
01/22/2021	Receive, review, and respond to email from client attaching mortgage statement	CS	415.00	0.10	41.50	0.00
01/22/2021	Receive, review, and respond to email from client regarding mortgage payments.	CS	415.00	0.10	41.50	0.00
01/25/2021	Meet with client in preparation for 341 meeting.	CS	415.00	0.20	83.00	0.00
01/25/2021	Attend 341 Meeting	CS	415.00	0.70	290.50	0.00
01/26/2021	Analyze proof of claim 5 filed on the docket	ASW	135.00	0.10	13.50	0.00
01/26/2021	Receive and review certification that 341 Meeting held. Create confirmation hearing docket and process scheduling of hearing.	ASW	135.00	0.40	54.00	-13.50
01/27/2021	Receive and review email from Vanatta at Hat Law regarding property lease.	CS	415.00	0.10	41.50	0.00
01/27/2021	Email to Vanatta regarding post-petition payments on property	CS	415.00	0.10	41.50	0.00
01/29/2021	Receive, review, and respond to email from Vanatta regarding property lease	CS	415.00	0.10	41.50	0.00

01/31/2021	Email to client with schedules, paystubs, motion for wage attachment, request for notice of case (2), certificate of service, order for wage attachment, certificate of financial management, plan, and notice of meeting of creditors filed on the docket	CS	415.00	0.10	41.50	0.00
02/01/2021	Review proof of claim analysis for comments from CS. Email to CS regarding the same	ASW	135.00	0.10	13.50	-13.50
02/01/2021	Analyze proof of claim 6 filed on the docket	ASW	135.00	0.30	40.50	0.00
02/01/2021	Receive and review BNC Certificate of notice regarding confirmation hearing filed on the docket	ASW	135.00	0.10	13.50	-13.50
02/01/2021	Receive and review BNC certificate of notice regarding plan filed on the docket	ASW	135.00	0.10	13.50	-13.50
02/01/2021	Review and analyze claim 7 filed on the docket	ASW	135.00	0.20	27.00	0.00
02/02/2021	Prepare letter to client regarding new payment address	ASW	135.00	0.10	13.50	0.00
02/02/2021	Do child support lien search	ASW	135.00	0.10	13.50	0.00
02/02/2021	Email to client regarding pre-confirmation certification that has to be filed with the court	CS	415.00	0.10	41.50	0.00
02/02/2021	Email to Vanatta regarding property.	CS	415.00	0.10	41.50	0.00
02/03/2021	Communication with trustee's office regarding objecting to plan.	CS	415.00	0.10	41.50	0.00
02/03/2021	Review proof of claim analysis	CS	415.00	0.10	41.50	0.00
02/04/2021	Receive and review notice of mortgage forbearance request filed on the docket	CS	415.00	0.10	41.50	0.00
02/05/2021	Receive and review signed pre-confirmation certification. Do checklist regarding the same	ASW	135.00	0.30	40.50	0.00
02/05/2021	Email to Charles Wohlrab regarding Regulation X Request	CS	415.00	0.10	41.50	0.00
02/05/2021	Receive and review email from Vanatta.	CS	415.00	0.10	41.50	0.00
02/05/2021	Email to Vanatta regarding amending plan and assuming lease	CS	415.00	0.10	41.50	0.00
02/05/2021	Receive and review email from Vanatta regarding assuming lease and amending plan being acceptable	CS	415.00	0.10	41.50	0.00
02/08/2021	Receive, review, and respond to email from client regarding financial planner	CS	415.00	0.10	41.50	0.00
02/09/2021	Prepare information request to Lakeview	ASW	135.00	0.20	27.00	0.00
02/10/2021	Review and analyze claim 8 filed on the docket	ASW	135.00	0.20	27.00	0.00
02/10/2021	Review and analyze claim 9 filed on the docket	ASW	135.00	0.20	27.00	0.00
02/11/2021	Email to Wohlrab with copy of request for information	CS	415.00	0.10	41.50	0.00
02/12/2021	Receive and review email from Wohlrab regarding sending request for information to his client	CS	415.00	0.10	41.50	0.00
02/13/2021	Call to client regarding financial planner and mortgage arrears.	CS	415.00	0.10	41.50	0.00
02/13/2021	Email to client with trustee's objection, request for mortgage forbearance, and pre-confirmation certification of compliance filed on the docket	CS	415.00	0.10	41.50	0.00
02/15/2021	Receive and review 2020 tax return from client. Review file. Email to CS regarding the same	ASW	135.00	0.10	13.50	0.00
02/15/2021	Redact tax return and send to trustee	ASW	135.00	0.10	13.50	0.00

02/15/2021	Receive, review, and respond to email from Vanatta regarding amending plan	CS	415.00	0.10	41.50	0.00
02/15/2021	Receive and review email from Vanatta thanking me for information concerning amended plan	CS	415.00	0.10	41.50	-41.50
02/15/2021	Email to client with notice of new payment address for shed lease.	CS	415.00	0.10	41.50	0.00
02/16/2021	Receive and review email from Julie Rodichok at trustee's confirming receipt of Debtor's 2020 return	ASW	135.00	0.10	13.50	-13.50
02/16/2021	Receive, review, and respond to email from Rodichok regarding conflicting issues concerning confirmation	CS	415.00	0.10	41.50	0.00
02/16/2021	Receive and review email from Rodichok regarding amending plan	CS	415.00	0.10	41.50	0.00
02/17/2021	Receive and review email from client regarding financial planner.	CS	415.00	0.10	41.50	0.00
02/21/2021	Email to client regarding financial planner	CS	415.00	0.10	41.50	0.00
02/22/2021	Receive and review signed and dated green card for letter to Lakeview Loan Servicing	ASW	135.00	0.10	13.50	0.00
02/22/2021	Conference with PM regarding confirmation hearing and forbearance	ASW	135.00	0.10	13.50	-13.50
02/22/2021	Call from financial planner.	CS	415.00	0.10	41.50	0.00
02/23/2021	Fill out third party authorization form and Panda to client	ASW	135.00	0.10	13.50	-13.50
02/23/2021	Receive and review email from Loancare regarding third party authorization form	CS	415.00	0.10	41.50	0.00
02/23/2021	Receive and review email from Loancare regarding longer than normal wait times.	CS	415.00	0.10	41.50	-41.50
02/23/2021	Receive and review email from Loancare regarding forwarding message to specialists.	CS	415.00	0.10	41.50	-41.50
02/24/2021	Start Ready for Confirmation checklist and prepare request for payment for filing	ASW	135.00	0.20	27.00	0.00
02/24/2021	Email to Loan Care with signed third party authorization form	CS	415.00	0.10	41.50	0.00
02/25/2021	Receive and review email from Loancare regarding message forwarded to processing team	CS	415.00	0.10	41.50	-41.50
02/26/2021	File request for payment	ASW	135.00	0.10	13.50	0.00
02/26/2021	Receive, review, and respond to email from Rodichok regarding filing amended plan	CS	415.00	0.10	41.50	0.00
02/26/2021	Receive and review email from Rodichok regarding sending hearing list to Judge Opel	CS	415.00	0.10	41.50	-41.50
02/26/2021	Receive and review email from financial planner with numbers	CS	415.00	0.10	41.50	0.00
02/28/2021	Email to McHale explaining amendments to schedules and plan	CS	415.00	0.10	41.50	0.00
03/01/2021	Analyze proof of claim 10 filed on the docket	ASW	135.00	0.20	27.00	0.00
03/01/2021	Review and analyze claim 11 filed on the docket	ASW	135.00	0.20	27.00	0.00
03/01/2021	Review and analyze claim 12 filed on the docket	ASW	135.00	0.20	27.00	0.00

03/01/2021	Receive and review objection to plan filed on the docket by counsel for Lakeview Loan Servicing. Review claims, and amended plan to be filed. Email to CS regarding the same	ASW	135.00	0.20	27.00	0.00
03/01/2021	Review request for payment filed on the docket	ASW	135.00	0.10	13.50	-13.50
03/01/2021	Review and analyze claim 13 filed on the docket	ASW	135.00	0.20	27.00	0.00
03/01/2021	Review and analyze claim 14 filed on the docket	ASW	135.00	0.20	27.00	0.00
03/01/2021	Receive and review amendment to schedules filed on the docket	ASW	135.00	0.10	13.50	-13.50
03/01/2021	Review analysis of claim 12.	CS	415.00	0.10	41.50	0.00
03/01/2021	Receive, review, and respond to email from McHale regarding amendments	CS	415.00	0.10	41.50	0.00
03/01/2021	Receive, review, and respond to email from McHale regarding time to speak about amendments	CS	415.00	0.10	41.50	-41.50
03/01/2021	Receive and review email from McHale thanking me	CS	415.00	0.10	41.50	-41.50
03/01/2021	Receive and review email from McHale regarding claims bar date	CS	415.00	0.10	41.50	0.00
03/01/2021	Receive and review email from McHale regarding Lakeview objection.	CS	415.00	0.10	41.50	0.00
03/01/2021	Call to Wohlrab to discuss objection. No answer, left message. Email to Wohlrab regarding the same and asking after continuance	CS	415.00	0.10	41.50	-41.50
03/01/2021	Receive and review email from Wohlrab agreeing to continuance and regarding talking tomorrow	CS	415.00	0.10	41.50	0.00
03/01/2021	Email to Wohlrab regarding speaking tomorrow	CS	415.00	0.10	41.50	-41.50
03/02/2021	Receive and review hearing list regarding confirmation hearing	ASW	135.00	0.10	13.50	0.00
03/02/2021	Receive and review email from Rodichok regarding confirmation hearing being continued to April 7	CS	415.00	0.10	41.50	0.00
03/02/2021	Receive, review, and respond to email from Wohlrab regarding amended plan and mortgage arrears	CS	415.00	0.10	41.50	0.00
03/02/2021	Receive and review email from Wohlrab regarding filing proof of claim this week and arrears	CS	415.00	0.10	41.50	0.00
03/04/2021	Email to McHale regarding child support, tax refund, and plan payment.	CS	415.00	0.10	41.50	0.00
03/05/2021	Receive, review, and respond to email from McHale regarding plan payment.	CS	415.00	0.10	41.50	0.00
03/05/2021	Receive and review email from McHale thanking me for information concerning payment	CS	415.00	0.10	41.50	-41.50
03/05/2021	Email to client with amended schedules filed on the docket	CS	415.00	0.10	41.50	-41.50
03/09/2021	Call to client regarding letter from Loancare	CS	415.00	0.10	41.50	0.00
03/09/2021	Email to client with letter from LoanCare and asking for documentation.	CS	415.00	0.10	41.50	0.00
03/09/2021	Receive and review email from client with payment history and attaching mortgage statement.	CS	415.00	0.10	41.50	0.00
03/11/2021	Receive and review proceeding memo regarding hearing continued. Process checklist of tasks after confirmation hearing date has been set.	ASW	135.00	0.40	54.00	0.00

03/11/2021	Analyze claim 16 filed on the docket. Email to CS with analysis of claim	ASW	135.00	0.30	40.50	0.00
03/11/2021	Receive and review claim 15 filed on the docket. Email to CS regarding claim withdrawal	ASW	135.00	0.10	13.50	-13.50
03/11/2021	Receive and review analysis of claim 16	CS	415.00	0.10	41.50	0.00
03/12/2021	Receive and review certificate of service from www.certificateofservice.com	ASW	135.00	0.10	13.50	-13.50
03/12/2021	File amended plan, notice, and certificate of service.	ASW	135.00	0.10	13.50	0.00
03/12/2021	Call to Wohlrab. No answer, left message. Email to Wohlrab regarding the same	CS	415.00	0.10	41.50	-41.50
03/12/2021	Email to client with new payment address for mortgage	CS	415.00	0.10	41.50	0.00
03/12/2021	Reconciliation of our client's payment records and mortgage company's payment records.	CS	415.00	0.20	83.00	0.00
03/12/2021	Contact domestic relations to verify ending date of domestic support order and prepare amended plan	CS	415.00	0.80	332.00	0.00
03/12/2021	Receive and review message from Wohlrab. Email to him regarding the same	CS	415.00	0.10	41.50	0.00
03/12/2021	Receive and review email from Wohlrab regarding amended plan	CS	415.00	0.10	41.50	0.00
03/13/2021	Email to BF regarding potential claims	CS	415.00	0.10	41.50	-41.50
03/15/2021	Review file for potential FDCPA claims	BF	310.00	1.70	527.00	-527.00
03/15/2021	Email to client regarding new confirmation hearing	CS	415.00	0.10	41.50	0.00
03/16/2021	Receive and review amended plan filed on the docket. Review proof of claim analysis and wage attachment. Set tasks regarding the same	ASW	135.00	0.30	40.50	0.00
03/16/2021	Email to McHale regarding amending plan again for the correct plan payment amount	CS	415.00	0.10	41.50	0.00
03/17/2021	Email to Wohlrab regarding amended plan	CS	415.00	0.10	41.50	0.00
03/17/2021	Receive and review email from Wohlrab regarding whether arrearage amount is correct	CS	415.00	0.10	41.50	0.00
03/22/2021	Email to client with schedules, paystubs, affidavit, request for notice, certificate of financial management, and statement of current monthly income filed on the docket	CS	415.00	0.10	41.50	0.00
03/24/2021	Email to Wohlrab regarding whether he has heard from his client	CS	415.00	0.10	41.50	-41.50
04/02/2021	Email to Wohlrab regarding amended plan	CS	415.00	0.10	41.50	0.00
04/15/2021	Prep notice of confirmation hearing for second amended plan	ASW	135.00	0.10	13.50	0.00
04/15/2021	Upload mailing to certificateofservice.com	ASW	135.00	0.20	27.00	0.00
04/15/2021	Receive and review confirmation of upload from www.certificateofservice.com	ASW	135.00	0.10	13.50	-13.50
04/15/2021	Receive and review certificate of service from www.certificateofservice.com	ASW	135.00	0.10	13.50	-13.50
04/15/2021	File second amended plan, notice, and certificate of service.	ASW	135.00	0.10	13.50	0.00
04/15/2021	Receive and review objection to amended plan	CS	415.00	0.10	41.50	0.00

04/15/2021	Email to McHale regarding amended plan and objection	CS	415.00	0.10	41.50	0.00
04/17/2021	Email to client with objection filed on the docket	CS	415.00	0.10	41.50	0.00
04/23/2021	Receive and review objection to plan filed on the docket	ASW	135.00	0.10	13.50	-13.50
04/23/2021	Receive and review amended plan filed on the docket. Review for actions to be taken. Set tasks.	ASW	135.00	0.30	40.50	0.00
04/23/2021	Do checklist of tasks after confirmation hearing date has been set.	ASW	135.00	0.40	54.00	0.00
04/26/2021	Call to client regarding local tax return. No answer, left message	ASW	135.00	0.10	13.50	-13.50
04/26/2021	Call from client regarding tax return.	ASW	135.00	0.10	13.50	0.00
04/29/2021	Receive and review email from client regarding tax return.	ASW	135.00	0.10	13.50	-13.50
04/29/2021	Email to client regarding new confirmation hearing date	ASW	135.00	0.10	13.50	0.00
04/30/2021	Receive and review email from client confirming his attached local return was for 2020	ASW	135.00	0.10	13.50	0.00
05/10/2021	Email to client regarding withdrawal of objection filed in his case	CS	415.00	0.10	41.50	0.00
05/14/2021	Email to client regarding wage attachment order and trustee letter	CS	415.00	0.10	41.50	0.00
05/24/2021	Review file regarding request for payment and confirmation hearing	ASW	135.00	0.10	13.50	0.00
05/26/2021	Review trustee's website to confirm trustee payment address was updated.	ASW	135.00	0.10	13.50	0.00
05/28/2021	Do ready for confirmation checklist. Email to CS regarding the same	ASW	135.00	0.30	40.50	0.00
05/28/2021	Call to client regarding wage attachment.	ASW	135.00	0.20	27.00	0.00
05/28/2021	Prep letter to client's employer. Email to client with letter to his employer	ASW	135.00	0.20	27.00	0.00
06/01/2021	Call from client. Instructed PM to tell him we won't need him in court this week. Email to CS regarding the same	ASW	135.00	0.10	13.50	-13.50
06/01/2021	Review file regarding wage attachment step-up. Reset tickler for one week.	ASW	135.00	0.10	13.50	-13.50
06/01/2021	Email to Gordon regarding possibility of proof of claim being filed	CS	415.00	0.10	41.50	0.00
06/01/2021	Receive, review, and respond to email from Gordon regarding proof of claim being filed within the hour	CS	415.00	0.10	41.50	-41.50
06/01/2021	Receive, review, and respond to email from Gordon regarding filing the claim as priority	CS	415.00	0.10	41.50	0.00
06/01/2021	Email to client regarding tax return documentation	CS	415.00	0.10	41.50	0.00
06/01/2021	Receive, review, and respond to email from Stires at Berkheimer with proof of claim filing receipt	CS	415.00	0.10	41.50	-41.50
06/02/2021	Receive and review hearing list from trustee. Case recommended for confirmation.	ASW	135.00	0.10	13.50	0.00
06/02/2021	Review email from Wohlrab regarding mortgage payments.	CS	415.00	0.10	41.50	0.00

06/02/2021	Call to client. No answer, left message	CS	415.00	0.10	41.50	-41.50
06/02/2021	Return call from client. Discuss mortgage arrears and future payments.	CS	415.00	0.20	83.00	0.00
06/02/2021	Email to Wohlrab regarding my client's payments	CS	415.00	0.20	83.00	0.00
06/03/2021	Receive and review order confirming chapter 13 plan	CS	415.00	0.10	41.50	0.00
06/04/2021	Review and analyze claim 17 filed on the docket. Email to CS with analysis	ASW	135.00	0.20	27.00	0.00
06/04/2021	Receive and review proceeding memo regarding plan eligible for confirmation	ASW	135.00	0.10	13.50	0.00
06/04/2021	Receive and review analysis of claim 17	CS	415.00	0.10	41.50	0.00
06/07/2021	Receive and review electronic notice of filing: Order Confirming Plan. Update file to reflect same. Do tasks related to confirmation of plan.	ASW	135.00	0.80	108.00	0.00
06/07/2021	Receive and review certificate of service from cos.com	ASW	135.00	0.10	13.50	0.00
06/07/2021	File certificate of service of order confirming second amended plan.	ASW	135.00	0.10	13.50	0.00
06/08/2021	Call to client regarding child support. No answer, left message	ASW	135.00	0.10	13.50	-13.50
06/08/2021	Call from client regarding child support.	ASW	135.00	0.10	13.50	0.00
06/08/2021	Receive and review email from Vanatta at Hat Law regarding missed payments.	CS	415.00	0.10	41.50	0.00
06/08/2021	Email to client regarding missed payments to VM Properties	CS	415.00	0.10	41.50	-41.50
06/08/2021	Receive and review email from client regarding payments to VM Properties.	CS	415.00	0.10	41.50	0.00
06/08/2021	Email to Vanatta at Hat Law regarding payments to VM properties.	CS	415.00	0.10	41.50	-41.50
06/09/2021	Receive, review, and respond to email from Vanatta regarding acceptable payment schedule to VM Properties	CS	415.00	0.10	41.50	0.00

Sub-total Fees: 12,727.00 -2,274.50

Net Fees After Discount: **10,452.50**

Expenses

<i>Date</i>	<i>Description</i>	<i>Price</i>	<i>Units</i>	<i>Amount</i>	<i>Discount</i>
12/16/2020	Best Case fee	8.00	1.00	8.00	0.00
12/18/2020	Accurint search	19.57	1.00	19.57	0.00
12/26/2020	Filing Fee	313.00	1.00	313.00	0.00
02/11/2021	Postage for letter to mortgage company requesting information	1.00	7.00	7.00	0.00
03/12/2021	Postage for mailing of notice and amended plan to matrix.	1.00	39.95	39.95	0.00
04/15/2021	Postage for mailing of second amended plan and notice	1.00	38.25	38.25	0.00
06/07/2021	Postage for service of order confirming second amended plan.	1.00	12.30	12.30	0.00

<i>Sub-total Expenses:</i>	<u>438.07</u>	0.00
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Trust Account

Date		Beginning Balance:	0.00
10/26/2020	Badyrka, Michael - Retainer		200.00
12/15/2020	Badyrka, Michael - Retainer		610.00
		Ending Balance:	<u>810.00</u>

Total

Net Fees After Discount:	10,452.50
Net Expenses After Discount:	<u>438.07</u>
<i>Total:</i>	<u>10,890.57</u>

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:

MICHAEL PETER BADYRKA; AKA
MICHAEL P. BADYRKA

Debtor

CHAPTER 13

CASE NO. 5:20-bk-03618-HWV

DECLARATION OF CARLO SABATINI IN SUPPORT OF HOURLY RATE

1. I, Carlo Sabatini, am debtor's counsel in this case, and I submit this declaration to support the *Application of Attorney for Chapter 13 Debtor For Compensation and Reimbursement of Expenses*.

2. I am a member in good standing of the bars of the following courts: Supreme Court of Pennsylvania, United States District Court for the Middle District of Pennsylvania, United States District Court for the Eastern District of Pennsylvania, United States District Court for the Western District of Pennsylvania, United States Court of Appeals for the Third Circuit, and the United States Supreme Court.

3. I have been a lawyer since 1999, the year that I graduated *magna cum laude* from Widener University School of Law - Harrisburg. I was ranked second in my class of 118 students. In 1992 I graduated from Bucknell University with a Bachelor of Science degree.

4. I am a contributing author to *Pennsylvania Consumer Law* by Carolyn Carter, Bisel Publishing Co., 2003, Supp. 2020. This is the leading legal treatise on Pennsylvania consumer law issues.

5. I am board-certified in consumer bankruptcy law by the American Board of Certification, which is a certification that is recognized by the Pennsylvania Supreme Court. I do not believe that that court recognizes a bankruptcy certification from any other organization.

6. No other attorney with an office in the Northern Tier of the Middle District of Pennsylvania has obtained this certification.¹#

7. The bankruptcy code recognizes board certification as a demonstration of skill and experience that should be considered in determining the amount of reasonable compensation.²

8. I have been selected by the Super Lawyers rating service from 2015 - 2021. This service selects no more than five percent of Pennsylvania lawyers who are evaluated on indicators of peer recognition and professional achievement.³

9. I have taught continuing legal education courses on the Fair Debt Collections Practices Act, the Real Estate Settlement Procedures Act, and the Bankruptcy Code.

10. As an instructor at the Administrative Office of Pennsylvania Courts, I have taught consumer law to prospective Magisterial District Judges.

11. Since I became an attorney, my firm's practice has been limited almost exclusively to matters involving consumer protection statutes or the bankruptcy code.

12. I have been co-counsel of record in the following successful appellate cases involving important consumer issues of first impression: *Barbato v. Greystone Alliance, LLC*, [916 F.3d 260](#), (3d Cir. Feb. 22, 2019); *Krieger v. Bank of Am., N.A.*, [890 F.3d 429](#) (3d Cir. 2018); *Daubert v. NRA Grp., LLC*, [861 F.3d 382](#) (3d Cir. 2017); *Evankavitch v. Green Tree Servicing, LLC*, [793 F.3d 355](#) (3d Cir. 2015); *Gager v. Dell Fin. Servs.*, [727 F.3d 265](#) (3d Cir. 2013).

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¹ <https://www.abcworl.org/content/search-attorneys?state=PA&city=&last-name=&certification=&search=Search> (last visited June 15, 2021).

² See 11 U.S.C. § 330(a)(3)(E).

³ https://www.superlawyers.com/about/selection_process.html (last visited June 15, 2021).

13. I have been appointed as co-counsel for certified classes of consumers. *Elaine v. Credit Control, LLC*, 2:15-cv-01271-RAL, Docket Entry 126 (E.D. Pa. December 6, 2018); *Benfield v. ESSA Bancorp, Inc.*, Docket 16-cv-1381 (Phila. Comm. Pleas April 20, 2018); *Saxe v. First Nat'l Cmty. Bank*, Docket 13-cv-5071 (Lacka. Comm. Pleas May 31, 2017); *Good v. Nationwide*, [314 F.R.D. 141](#) (E.D. Pa. 2016); *Richards v. Client Services, Inc.*, [2015 WL 5836274](#), *2 (M.D. Pa. October 5, 2015); *Blandina v. Midland Funding, LLC*, [303 F.R.D. 245](#), 254 (E.D. Pa. 2014); *Dorrance v. ARS National Services, Inc.*, 12-2502, [Doc. 31](#) (M.D. Pa. September 26, 2014).

14. I have billed for the services rendered in this case at my standard current hourly rate of \$415.00 per hour. This rate has been in effect since January 1, 2018 and is the rate that I charge clients who are paying for my services on a non-fee-shifting basis.

15. This rate is consistent with the prevailing market rates in the relevant community for consumer rights litigation work and for bankruptcy work of similar skill level and experience.⁴

16. In fact, the current rate is *below* the low end of the appropriate local market rate. I have been an attorney for over 21 years. The Community Legal Services Fee Schedule indicates that an appropriate rate for attorneys with 21 to 25 years of experience is from \$550.00 -

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⁴ Judges in this district have held that the “relevant community” includes the entire Middle District and Eastern District of Pennsylvania. *See e.g., Valenti v. Allstate Ins. Co.*, [243 F.Supp.2d 200, 207 \(M.D. Pa 2003\)](#), where Judge Mannion held “that the ‘relevant community’ for the purpose of determining billing rates in [a] bad faith claim includes not only Northeastern Pennsylvania, but at least, the entire Middle District and Eastern District of Pennsylvania.” In reaching this holding, the court mentioned its “experience in often seeing counsel from the Eastern District of Pennsylvania practicing in both federal and local courts within the Middle District of Pennsylvania.” *Id.*

\$640.00. <http://clsphila.org/about-cla/attorney-fees>. Thus, my rate is substantially less than the minimum stated reasonable fee.

17. The Community Legal Services Fee schedule has been approvingly cited by the Third Circuit with respect to rates in Philadelphia. *See Maldonado v. Houstoun*, [256 F.3d 181, 187](#) (3d Cir. 2001).⁵

18. The rate that is being sought is similar to rates that are charged by other non-bankruptcy attorneys in the relevant community who perform hourly services on a contingent basis. *See, In re Busy Beaver Building Centers, Inc.*, 19 F.3d 833, 841 (3d Cir. 1994).

19. My 2018, 2016, 2015, 2014, 2013 and 2012 hourly rates have also been approved by bankruptcy judges in this district.

20. Since 2018, my standard rate has been \$415.00 per hour.

a. On August 30, 2018, Chief Bankruptcy Judge Robert N. Opel, II approved an application for fees for bankruptcy services performed in *In re Karl DeSanto, Jr.*, 5:18-bk-01167-RNO, Doc. [31](#). The application included some time charged at the rate of \$415.00 per hour. (See Doc. [30-2](#).)

⁵ The rates listed in the fee schedule have been updated a number of times since the *Maldonado* decision. In *Paulus ex rel. P.F.V. v. Cordero*, No. 3:12-CV-986, [2013 WL 432769](#), at *8 (M.D. Pa. Feb. 1, 2013), Judge Caputo cited to *Valenti* and *Maldonado*, and then applied the Community Legal Services Fee Schedule to set appropriate rates. *See also, Brown v. TrueBlue, Inc.*, No. 1:10-CV-00514, [2013 WL 5947499](#), at *3 (M.D. Pa. Nov. 5, 2013)(Kane, J. setting hourly rates after reference to the Community legal Services Fee Schedule); *Stockport Mountain Corp., LLC v. Norcross Wildlife Found., Inc.*, No. 3:11CV514, [2014 WL 131604](#), at *4 (M.D. Pa. Jan. 13, 2014)(Munley, J., same); *Benjamin v. Dep't of Pub. Welfare of Com. of Pennsylvania*, No. 1:09-CV-1182, [2014 WL 4793736](#), at *8 (M.D. Pa. Sept. 25, 2014)(Jones, J)(approving rates after stating that “[w]hile the hourly rates charged may be somewhat higher than the typical rate here in the Middle District, the rates are in step with those prescribed as reasonable under the Community Legal Services fee schedule (Doc. 348–8, p. 20, 21), which courts in our District have deemed instructive.”)

21. For 2016, my standard rate was \$375.00 per hour.

a. On November 2, 2016 Bankruptcy Judge John J. Thomas approved an application for fees for bankruptcy services performed in *In re Bitting*, 5:14-bk-03884-JJT, Doc. [35](#) and [37](#). The application included some time charged at the rate of \$375.00 per hour.

b. On August 30, 2016 Bankruptcy Judge Robert N. Opel, II approved an application for fees for bankruptcy services performed in *In re Bonomo*, 5:16-bk-01894-RNO, Doc. [43](#) and [45](#). The application included some time charged at the rate of \$375.00 per hour.

22. For 2015, my standard rate was \$350.00 per hour.

a. On July 23, 2015 Bankruptcy Judge John J. Thomas, conducted a contested hearing on fees for plaintiffs who had asserted violations of the bankruptcy automatic stay. At the conclusion of the hearing, the court issued a bench decision awarding the plaintiffs the “full amount requested.” *See Reed et al., v. Heller’s Gas, Inc.*, 5:13-ap-00207-JJT, Doc. [73](#), p.1 (Bankr. M.D. Pa. January 7, 2016). However, the written order that was entered four days later omitted \$7,395.00 for time spent litigating the issue of fees. *Id.* Plaintiff filed a motion for reconsideration, and on January 7, 2016 the court issued an opinion and order granting the reconsideration, and awarding an additional \$7,395.00 for a total of \$46,359.68. *Id.* at Doc. [73](#) and [74](#). The application included time sought at the 2015 rate of \$350.00 per hour.⁶

b. On March 6, 2015 Bankruptcy Judge Robert N. Opel, II approved an application for fees for bankruptcy services performed in *In re Richmond*, 5:14-bk-02225-RNO, Doc. [52](#) and [55](#). The application included some time charged at the rate of \$350.00 per hour.

23. For 2014, my standard rate was \$325.00 per hour.

⁶ Though the defendant vigorously opposed the fee application on several bases, and requested a downward departure of 75% from the lodestar, the defendant did stipulate to the reasonableness of the rates requested.

a. On March 21, 2014, Bankruptcy Judge Robert N. Opel, II approved this rate in *In re Mackrell*, 5:10-bk-08100-RNO, Doc. [69](#). The approval was for anticipated services to be performed in a case asserting violations of the FDCPA and the Bankruptcy Code.

b. On April 21, 2014, Bankruptcy Judge John J. Thomas approved this rate in *In re Ramos*, 5:11-bk-01583-JJT, Doc [61](#) and [66](#). The approval was for bankruptcy services.

c. On July 25, 2014, Bankruptcy Judge John J. Thomas again approved this rate in *In re Black*, 5:12-bk-06249-JJT, Doc. [49](#) and [50](#). The approval was for bankruptcy services.

24. For 2013, my standard rate was \$315.00 per hour.

a. On July 11, 2013 Bankruptcy Judge Robert N. Opel, II approved this rate in *In re Wolfe*, 5:13-bk-00968-RNO, [Doc. 21](#) and [22](#). The approval was for anticipated litigation services.

b. On May 30, 2013, Bankruptcy Judge John J. Thomas approved the 2013 rate in *In re Bauer*, 5:12-bk-07246-JJT, [Doc. 53](#) and [56](#). The approval was for anticipated litigation services.

25. For 2012, my standard rate was \$300.00 per hour.

a. Bankruptcy Judge John J. Thomas approved this rate after a contested hearing held on December 19, 2012 in *Grochowski v. Commonwealth Financial Systems, Inc., et al.*, Bankruptcy Court Docket 5:11-ap-00223. Judge Thomas issued an order ([Doc. 45](#)) awarding fees and costs of \$29,782.77 over the Defendants' objection to the hourly rate and to the time spent. This fee award was the full amount of the statement that had been filed with the Court ([Doc. 40-2](#)). The statement included time billed in 2012 at the rate of \$300.00 per hour.

b. On September 26, 2012, Bankruptcy Judge John J. Thomas approved this rate for bankruptcy services performed in *In re Sitar*, 5:08-bk-51801-JJT, [Doc. 90](#) and [91](#).

c. On March 27, 2012, Bankruptcy Judge Robert N. Opel, II approved this rate in *In re Mackrell*, 5:10-bk-08100-RNO, [Doc. 36](#) and [37](#). The approval was for anticipated litigation services.

26. My rates have also been reviewed by a number of District Judges.

27. On April 9, 2018, Magistrate Judge Richard Lloret of the Eastern District of Pennsylvania approved the requested rate of \$410.00 per hour. *Elaine v. Credit Control, LLC*, 2018 WL 1705959 (E. D. Pa. April 9, 2018).

28. On June 1, 2016, Judge Nitza Quiñones Alejandro of the Eastern District of Pennsylvania approved the rate of \$410.00 per hour and observed that the rates requested by my firm were “well within the range of what is reasonable and appropriate in this market.” *Blandina v. Midland Funding, LLC*, 2016 WL 3101270, at *7 (E.D. Pa. June 1, 2016); *see also* underlying docket 13-1179 at Doc. 88-7, p.3, ¶ 13.

29. Judge Richard Conaboy approved the 2016 rate of \$375.00 per hour in *Romeo v. Simm Associates, Inc.*, [170 F.Supp.3d 750](#), at *1 (M.D. Pa. Mar. 16, 2016) and observed that “the Court is hardly surprised at attorney’s fees calculated at \$375.00 per hour for an attorney with 16 years experience who specializes in consumer protection law.”

30. On October 5, 2015, Judge Caputo approved the 2015 rate of \$350.00 per hour in *Richards v. Client Services, Inc.*, [2015 WL 5836274](#), *2 (M.D. Pa. October 5, 2015) (also see the court docket [Doc. 28](#), page 21 where the hourly rate sought was \$350.00).

31. Judge James M. Munley approved a requested rate of \$315.00 for a total fee and cost award of \$86,351.94 (of a requested \$93,764.79) in an individual FDCPA case where a jury had awarded an underlying recovery of \$1,000.00 in statutory damages. [Evankavitch v. Green Tree Servicing, LLC](#), 2014 WL 4437645 (M.D. Pa. Sept. 9, 2014).

32. Judge William J. Nealon approved a rate of \$300.00 for a total fee and cost award of \$24,938.21 (of a requested \$26,945.66) in an individual FDCPA case where there had been an underlying recovery of \$1,000.00 in statutory damages. [Lukawski v. Client Services, Inc., 2013 WL 6154544 \(M.D. Pa. Nov. 22, 2013\).](#)

33. In 2010, I represented a plaintiff in an individual FDCPA case. Judge Thomas I. Vanaskie granted plaintiff summary judgment as to liability, and pursuant to a previous stipulation with the parties, he awarded the Plaintiff \$1,000.00 in statutory damages. [Gryzbowski v. I.C. Sys., Inc., 691 F. Supp. 2d 618, 624 \(M.D. Pa. 2010\).](#) Magistrate Judge William T. Prince issued a Report and Recommendation on Plaintiff's contested fee application recommending that the entire amount of the \$23,419.54 fee request be approved. [Gryzbowski v. I.C. Sys., Inc., 2010 WL 2507516 \(M.D. Pa. May 24, 2010\).](#) Judge Vanaskie adopted the Report and Recommendation. [2010 WL 2470853 \(M.D. Pa. June 15, 2010\).](#) The rate that was approved in that case was \$275.00 per hour.

34. The rate of \$275.00 per hour was approved by Judge James M. Munley on December 21, 2009 in the case of [Moses v. The Law Office of Harrison Ross Byck, Esq., P.C., et al., 3:08-cv-01939-JMM \(M.D. Pa. 2008\)\(Dkt. Entry 43\).](#) The total fee was \$24,994.00 in an individual case where there had been an underlying recovery of \$1,000.00.

35. The rate of \$275.00 per hour was approved by Judge A. Richard Caputo on September 24, 2008 in the case of [Galuska v. Collectors Training Institute of Illinois, 3:07-cv-02044-ARC \(M.D. Pa. 2008\)\(Dkt. Entry 33\).](#)

36. The rates that I have charged for the other professionals in my firm are within the range of the prevailing market rates in the community.

37. Paralegal time was charged at \$135.00 per hour. This rate is below the rates approved by the [CLS Fee Schedule](#), which provides for a rate of \$160.00 - \$200.00 for a paralegal, or \$205.00 - \$230.00 for a senior or supervisory paralegal.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 15, 2021

s/ Carlo Sabatini
Carlo Sabatini